

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

1 Aidee Juarez-Cantu  
A208 286 843 YOB: 1996  
United States  
2 Eusebio Orozco III  
A208 286 842 YOB: 1995  
United States

Principal

Co-Principal

United States District Court  
Southern District of Texas  
FILED

JUL 18 2015

Case Number:

M-15-1196-M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about July 16, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Aldair Antonio-Cruz a citizen of Mexico and Lourdes Ramirez-Lopez a citizen of Guatemala and three (3) other undocumented aliens for a total of five (5), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Mission, Texas to the point of arrest in Mission, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On July 16, 2015 at approximately 2:35 P.M. BPA Agent A. Cantu was conducting routine patrol near the entrance to Anzalduas Park near Mission, Texas. BPA Cantu then observed a black in color Dodge Charger traveling west bound from the Anzalduas Park entrance north of the levee and canal along a dirt road at a high rate of speed. As the vehicle approached the Monastery south east brush line BPA Cantu observed several individuals on the north side of the road running east bound toward the vehicle and load into the car. BPA Cantu then observed the vehicle continue to travel at a high rate of speed west bound along that same dirt road. BPA Cantu advised units in the area of what he had witnessed via service radio and nearby agents responded.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint ☒ Yes ☐ No

Signature of Complainant

Cipriano Shears Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

July 18, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

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**CONTINUATION:**

BPA Hiram Perez assigned to that immediate area, responded via service radio that a vehicle matching the same description on that same dirt road began heading north bound at a high rate of speed from the south west corner of the Monastery. Agent Perez advised agents that the vehicle was heading north toward FM 494 Shary loop by the curve with the railroad tracks.

At this time, agent Perez conducted a vehicle stop on the Dodge Charger near the intersection of FM 494 Shary loop and the entrance to Anzalduas Park. Upon inspection of the passengers inside the vehicle it was determined that five of the individuals in the back seat did not possess any legal documentation to be in or remain in the United States. After determining that they were in the United States illegally without proper documentation they were placed under arrest. The driver later identified as, Eusebio OROZCO III and front seat passenger later identified as, Aidee JUAREZ-Cantu, both United States citizens were also placed under arrest.

The vehicle along with the individuals were then taken to the McAllen Border Patrol Station for further processing.

**PRINCIPAL STATEMENT:**

Eusebio OROZCO III and Aidee JUAREZ-Cantu were advised of their Miranda Right, both signed the form indicating that they understood their rights and were willing to provide a sworn statement without the presence of an attorney.

Principal Statement (Driver): Eusebio OROZCO III

Eusebio OROZCO III stated that Aidee JUAREZ-Cantu had called him, to see if he wanted to get paid for picking up some Undocumented Aliens (UDA). OROZCO claims that he was going to be paid over \$500.00 USD for the job. OROZCO claims that he picked up the illegal aliens just west of the Anzalduas Park Main Entrance on the corner of the brush just south of the levee. OROZCO stated that he picked up 5 bodies and that he was going to an unknown location in the McAllen, Texas area. OROZCO claims that Aidee JUAREZ-Cantu was the one in contact with the smugglers the whole time.

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**CO-PRINCIPAL STATEMENT:**

Principal Statement (Passenger): Aidee JUAREZ-Cantu

Aidee JUAREZ-Cantu stated that she was offered a job to pick-up undocumented aliens by a man named "ROMEO". JUAREZ claims "ROMEO" got her get in contact with an individual known as "TIA" who was organizing the smuggling from Mexico. JUAREZ claims they were going to pay her about \$500.00 USD to smuggle the Undocumented Aliens to an undisclosed location in McAllen, Texas. JUAREZ claims she was called at 8:30 AM to be ready and that was when she called Eusebio OROZCO III to pick her up. JUAREZ claims she and OROZCO picked up the undocumented aliens just west of the Anzalduas Park Entrance.

**MATERIAL WITNESS STATEMENTS:**

Aldair ANTONIO-Cruz and Lourdes RAMIREZ-Lopez were advised of their Miranda Right, both signed the form indicating that they understood their rights and were willing to provide a sworn statement without the presence of an attorney.

Material Witness Statement: Aldair ANTONIO-Cruz

Aldair ANTONIO-Cruz stated he had crossed the river at around 9:00 AM with a group of 8 including 3 guides. ANTONIO claims they the guides told them a black car would pick them up as soon as they crossed a canal. ANTONIO stated that once they crossed the canal a black car came by and picked them up. ANTONIO claims he saw a male driver and female passenger already in the car when he entered and that the female was talking to someone, but he couldn't understand because it was in English. Antonio was able to identify Eusebio Orozco as the driver of the vehicle he got into and Aidee Juarez-Cantu as the front right passenger out of a photo line up

Material Witness Statement: Lourdes RAMIREZ-Lopez

Lourdes RAMIREZ-Lopez stated that she had crossed early in the morning like around 9 or 10:00 AM, with 5 other subjects and 3 guides. RAMIREZ claims the guides gave them instructions to cross the canal and they would be picked up in a black car. RAMIREZ claims that like 10 minutes after they crossed the canal, a black car came by and picked them up. RAMIREZ stated she was able to see the driver and the passenger. RAMIREZ stated that they were all crammed in the back seat and that it was so tight of a space that one of the little girls was sitting on her lap and the other child was sitting on her mother laps. RAMIREZ stated she was scared because the driver was driving really fast and she thought the car would flip. Lourdes was able to identify Eusebio

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Orozco as the driver of the vehicle she got into and Aidee Juarez-Cantu as the front right passenger out of a photo line up.